

ATTACHMENT G-2:**DEFENDANT'S LIST OF EVIDENCE TO BE TENDERED AT TRIAL**

ADMITTED	EXH. NO.	DESCRIPTION
	D-1	March 17, 2020 Settlement Agreement
	D-2	Nicholas Sandmann Affidavit
	D-3	July 24, 2020 Chris Marquardt Letter
	D-4	August 10, 2020 Chris Marquardt Letter
	D-5	August 25, 2020 Email Exchange – Drew Beal/Chris Marquardt
	D-6	August 27, 2020 Email Exchange – Drew Beal/Joey Burby
	D-7	August 31, 2020 Plaintiffs' Verified Complaint
	D-8	August 31, 2020 Chris Marquardt Letter
	D-9	Statement of L. Lin Wood Regarding Lawsuit
	D-10	Chris Marquardt Affidavit
	D-11	October 8, 2020 Order on O.C.G.A. 9-11-12(f), entered by Judge Constance Russell
	D-12	March 4, 2021 Substitution of Counsel
	D-13	March 31, 2020 Client Referral
	D-14	April 10, 2020 Client Referral
	D-15	April 18, 2020 Client Referral
	D-16	May 11, 2020 Client Referral
	D-17	May 20, 2020 Client Referral
	D-18	May 21, 2020 Client Referral
	D-19	May 27, 2020 Client Referral

	D-20	May 27, 2020 Client Referral
	D-21	June 1, 2020 Client Referral
	D-22	June 3, 2020 Client Referral
	D-23	June 5, 2020 Client Referral
	D-24	June 7, 2020 Client Referral
	D-25	June 11, 2020 Client Referral
	D-26	June 22, 2020 Client Referral
	D-27	June 23, 2020 Client Referral
	D-28	June 24, 2020 Client Referral
	D-29	June 29, 2020 Client Referral
	D-30	July 27, 2020 Client Referral

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S EXHIBITS

D-2 – Hearsay (non-party affidavit)

D-10 – Hearsay (non-party affidavit)

Plaintiffs further object on the basis that Defendant has only provided his list of exhibits on May 9, 2024, without bates numbers, and Plaintiffs are therefore otherwise unable to review and lodge appropriate objections to any of the other documents, including on relevance grounds. Defendant provided a copy of his exhibits on May 10, 2024, and Plaintiffs have not had sufficient time to review Defendant's exhibits. Accordingly, Plaintiffs reserve their right to object after their review, which will be submitted to the Court prior to the pre-trial conference.

Defendant also reserves his right to Plaintiffs' proposed exhibits prior to the pre-trial conference.